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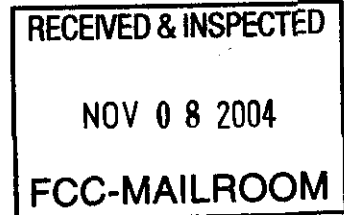
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DOCKET FILE COPY ORIGINAL



November 5, 2004

Federal Communications Commission  
Office of the Secretary  
9300 East Hampton Drive  
Capitol Heights, MD 20743

RE: ANSWER TO "IN THE MATTER OF REQUEST FOR REVIEW BY  
RELCOMM, INC. OF DECISION OF UNIVERSAL SERVICE"  
ADMINISTRATOR  
CC Docket No. 02-6  
SLD Decision 1022916 and 11023492, Year Six E-Rate  
Billed entity #123420: Atlantic City Board of Education

Dear Sir/Madam:

Please be advised that this firm represents the interests of Micro Technology Groupe, Inc., the successful bidder, selected vendor and third-party in the above-captioned matter.

Enclosed please find an original and four copies of a Petition for Waiver of 47 C.F.R. § 54.721(d) and the Response of Micro Technology Groupe, Inc. to Request for Review by RelComm, Inc. of Decision of Universal Service Administrator.

Thank you for your attention to this matter.

Respectfully submitted,

**ABRAHAMS, LOEWENSTEIN & BUSHMAN, P.C.**

BY:

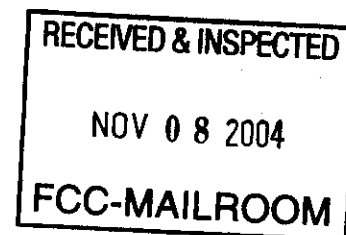
Ralph J. Kelly

RJK/dg  
Enclosures

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ABRAHAMAS, LOEWENSTEIN & BUSHMAN, P.C.  
By: Ralph J. Kelly, Esquire  
By: Donna M. Brennan-Scott, Esquire  
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Haddonfield, NJ 08033  
(856) 795-5560



*Attorneys for Defendant, Micro Tech*

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

Schools and Libraries Universal Service	:	CC Docket No. 02-6
Mechanism	:	
	:	SLD Decision 1022916 and
	:	1023492
In the Matter of Request for Review by	:	
RelComm, Inc. of the Decision of the Universal	:	Billed Entry No. 123420
Administrator	:	Atlantic City Board of Education

**THIRD PARTY PETITION OF MICRO TECHNOLOGY  
GROUPE, INC. FOR WAIVER OF 47 C.F.R. § 54.721(d)**

Micro Technology Groupe, Inc. ("MTG"), the successful bidder, selected vendor and third-party in the above-captioned matter, petitions for waiver of the rules governing the review and consideration of the Request for Review submitted by RelComm, Inc. ("RelComm") to the Federal Communications Commission ("FCC") dated August 6, 2004.

Pursuant to 47 C.F.R. § 54.721(d), if a request for review alleges prohibitive conduct on the part of a third party, the request for review shall be served on the third party. Further, the "third party may file a response to the Request for Review." The third party must abide by the time period applicable to the filing of reply that is set forth in Section 1.45.

However, pursuant to 47 C.F.R. § 1.3, the FCC's rules may be waived upon a showing of good cause. Therefore, it is respectfully requested that the FCC waive the provisions of 47 C.F.R. § 54.721(d) for the following good cause reasons.

First, MTG was never properly served with a copy of the Request for Review pursuant to statute. Although undersigned counsel, who represented MTG for purposes of the state court

trial, was sent a copy of the Request for Review in the mail, he was not authorized to accept service on behalf of MTG for any other proceedings, including that instituted with the Federal Communications Commission. Furthermore, although Administrative Rule § 1.47(d) provides that “when a party is represented by an attorney of record in a formal proceeding, service shall be made upon such attorney,” MTG was dropped from the state court action and it is no longer a party to that matter which is still pending. Additionally, undersigned counsel never represented MTG in any formal proceeding pertaining to the bidding process or awarding of the contract by the Atlantic City Board of Education and, as a result, service should have been made on MTG directly.

Therefore, since MTG has never been properly served, and undersigned counsel has since been authorized as representative of MTG for purposes of these proceedings, it is respectfully requested that MTG’s Petition for Waiver be granted and the Commission accept the attached response.

Additionally, assuming *arguendo*, that service was proper, a review of the voluminous documents filed by RelComm indicates a complex and lengthy pleading relying on documentation obtained in the state court matter of which Petitioner is not a party. Most facts are directed to the Atlantic City Board of Education and are issues peculiarly within the knowledge of the Atlantic City Board of Education. Petitioner, then, had to devote substantial time to investigating and analyzing the contents of the Request for Review and was dependent upon the Atlantic City Board of Education, who has been in the midst of pretrial litigation and discovery in the civil lawsuit filed by RelComm, for a comprehensive response. For this reason, it is respectfully requested that MTG’s Petition for Wavier be granted and the commission accept

the attached response.

Finally, this is an important matter to Micro Technology Groupe, Inc. as it involves allegations of improprieties and a request to reverse SLD's decision to fund ACBOE's Year-Six application and to suspend or disbar Micro Technology Groupe, Inc. from participation in the E-Rate Program. The severity of the remedy which RelComm seeks would be extremely harsh and detrimental to the business of MTG. Consequently, it is in the public interest to consider the attached response and RelComm will not be prejudiced if this Petition is granted.

**WHEREFORE**, Petitioner Micro Technology Groupe, Inc. respectfully submits that it has shown good cause in support of its Petition for Waiver and requests that 47 C.F.R. § 54.721(d), if applicable in light of lack of proper service, be waived so that the attached response may be filed.

**ABRAHAMS, LOEWENSTEIN & BUSHMAN, P.C.**

BY:



RALPH J. KELLY, ESQUIRE

DONNA M. BRENNAN-SCOTT, ESQUIRE

Attorneys for Petitioner

Dated: 11-5-04

**ABRAHAMS, LOEWENSTEIN & BUSHMAN, P.C.**

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*Attorneys for Defendant, Micro Tech*

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

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Administrator	:	Atlantic City Board of Education

**PROOF OF SERVICE**

On November 5, 2004, I, the undersigned, personally served an original and four (4) copies of the within Petition of Micro Technology Groupe, Inc. for Waiver of 47 C.F.R. § 54.721(d) and Response to Request for Review by RelComm, Inc. of Decision of Universal Administrator to the Federal Communications Commission, Office of the Secretary, 445 - 12<sup>th</sup> Street, SW, Washington, DC 205654 via Federal Express Overnight Delivery.

I further certify that on November 5, 2004, I, the undersigned, personally served one copy of the within Petition of Micro Technology Groupe, Inc. for Waiver of 47 C.F.R. § 54.721(d) and Response to Request for Review by RelComm, Inc. of Decision of Universal Administrator upon the following individuals via First Class Mail:

J. Phillip Kirchner, Esquire  
Flaster Greenberg, P.C.  
1810 Chapel Road  
West Cherry Hill, NJ 08002

Gino F. Santori, Esquire  
Jacobs & Barbone  
1125 Pacific Avenue  
Atlantic City, NJ 08240

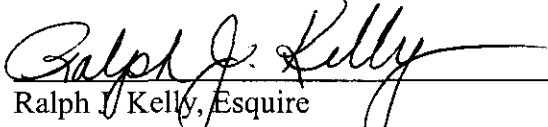
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3131 Princeton Pike  
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Lawrenceville, NJ 08648

Schools and Library Division  
Box 125  
Correspondence Unit  
80 South Jefferson Road  
Whippany, NJ 07981

I hereby certify that the foregoing statements made by me are true. I am aware that if any  
of the foregoing statements made by me are willfully false, I am subject to punishment.

BY:   
Ralph J. Kelly, Esquire  
Donna M. Brennan-Scott, Esquire

Dated: November 5, 2004

**ABRAHAMS, LOEWENSTEIN & BUSHMAN, P.C.**

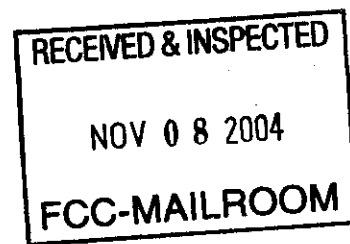
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**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

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**RESPONSE OF MICRO TECHNOLOGY GROUP, INC.  
TO RELCOMM, INC.'S REQUEST FOR REVIEW  
OF UNIVERSAL SERVICE ADMINISTRATOR'S DECISION**

**I. INTRODUCTION**

Respondent, Micro Technology Groupe, Inc. (hereinafter "MTG") hereby responds to RelComm Inc.'s (hereinafter "RelComm") Petition for Review. Preliminarily it should be noted that most facts in the Request for Review are directed to the Atlantic City Board of Education (hereinafter "ACBOE") and pertain to facts peculiarly within the knowledge of the School District. Accordingly, Micro Technology Groupe, Inc. concurs in the joint response of ACBOE and Alemar Consulting and incorporates by reference its answers therein as though fully set forth herein at length.

This marks RelComm's third attempt to prevent the legitimate award of work to MTG. Like its first two attempts, RelComm's Petition is riddled with half-truths, misrepresentations and other distortions in a critically flawed effort to block the legitimate award of work that was

brought about largely by its own defective work for the Atlantic City Board of Education and its schools.

RelComm asserts that its allegations “are currently the subject of a lawsuit pending in the Superior Court of New Jersey . . .” and RelComm attaches a copy of the complaint to its petition. What RelComm conveniently fails to mention is that it dropped MTG from the suit because it had no evidence to support its allegations against MTG. A true and correct copy of the order dismissing MTG from the suit is attached hereto as Exhibit A. This is typical of RelComm’s continual “throw it against the wall and see if it sticks” tactics in this matter. Make enough averments, regardless of their completeness or accuracy, and maybe your opponent will not be able to respond to all of them.

The whole truth of the matter is that RelComm did not have a federal court case against MTG (it dropped that lawsuit in the face of a motion to dismiss); a few months ago, in state court, it did not have sufficient evidence to sustain a case against MTG and it dropped them from that lawsuit; and it does not have one now. The specifics of its Petition suffer from the same defect as the half-truth contained in its introduction. The whole truth is that RelComm’s performance for the ACBOE under the E-rate program was defective. Consequently, when the ACBOE invited competition, RelComm could not legitimately compete in what was a full and fair competitive bidding process, and now it seeks this Commission’s assistance in continuing its defective work and in depriving the legitimate award to a reputable company.



**II. MTG HAS NO “RELATIONSHIP” WITH ALEMAR - IT SIMPLY WON E-RATE BIDS**

RelComm contends that MTG has received a contract award each and every time “Aleamar has managed the E-Rate process on behalf of a school district, a total of 31 times dating back to Year 3 of the E-Rate Program”. *See RelComm Request for Review at 3.* Again, this is true only so far as it goes. What RelComm omits is the whole truth: MTG received only part of the entire E-rate program award, and fails to mention the bids and/or portions of the bids that MTG did not receive. Other entities such as Peco Hyperion, Geoffrey P. Deans, Nextel, Compuworld, ComTec, and others also received awards for those programs. More significantly, the propriety of those awards was never challenged and RelComm cannot point to known bid-rigging, bid protest, or other irregularities in the award of those bids in the very public arena that is E-Rate. Far from showing any malfeasance, the award of these E-Rate contracts is a testament to MTG’s competency and integrity in the E-Rate arena.

**III. THERE WAS NO SECRET WALK-THROUGH - THE DISTRICT TOLD RELCOMM OF THE EARLIER WALK-THROUGH IN WHICH OTHER BIDDERS PARTICIPATED**

As to its claim that Aleamar conducted a second walk-through of the high school facilities to which RelComm and others were not invited, this is yet another example of RelComm’s penchant for playing fast and loose with the facts. The truth is that there was no second walk- through to which RelComm and other bidders were not invited.

The high school was toured during the first walk-though and MTG was not the only vendor to participate. CompuWorld also participated in that walk-through and submitted a

competitive bid. Martin Friedman's e-mail to RelComm, attached to the ACBOE's response to the Request for Review as Exhibit 2, specifically conveyed to RelComm that "one walk-through has already taken place and, I believe, that a second walk-through is being scheduled for this week. Please contact John Holt . . . to be placed on that tour." RelComm's contention is also specifically contradicted by its own submission. Exhibit H to RelComm's petition is the sign-in sheet for the walk-through that shows that representatives from Interlink, Comtec and Geoff Deans also attended the walk-through that RelComm now contends others were not invited to.

There was also nothing secret about any walk-throughs. Martin Friedman explicitly told RelComm in the above-referenced e-mail that one had occurred and another was being scheduled. Significantly, until it commenced its flurry of defective litigation, RelComm never complained to anyone about the walk-through that it now contends was a bidding irregularity.

#### **IV. PVBX IS NOT A BID IRREGULARITY; IT'S AN E-RATABLE PRODUCT PRODUCT CALLED FOR BY THE BID DOCUMENTS**

RelComm's contention that MTG's inclusion of a PVBX in its bid is further proof of a bidding irregularity also fails. First, as set forth in ACBOE's response to the Request for Review, the Form 470 called for a VOIP with video and video equipment, and the PVBX is the functional equivalent of that system. The PVBX solution was included in the MTG bid because the School Board wanted a "best solution." It was understood that such equipment was 100% E-rate eligible and the PVBX pricing was separated from the rest of the other prices in case the School Board chose not to submit it for E-rate funding. However, it was approved by the SLD for funding in Year 6.

Contrary to RelComm's bald assertion that it is not e-ratable, it is clearly e-ratable, and we concur in the response filed by the ACBOE and incorporate the same by reference as though fully set forth herein at length.

**V. MTG WAS NOT GIVEN SEPARATE DOCUMENTS;  
RELCOMM AUTHORED THE DOCUMENTS**

This is yet another example of RelComm's duplicitous behavior. RelComm contends that MTG was given documents that were not given to other prospective bidders. *See RelComm Request for Review at 9-10.* RelComm claims that documents regarding the PVBX system, a document entitled Network Diagram of ACBOE, and a document that RelComm alleges contains the existing wiring LAN breakdown of all the schools within the district were provided to MTG and "not given to other bidders." Lost in the babble, however, is whether or not RelComm had access to these documents. The fact, and whole truth, is that the Network Diagram and LAN breakdown are RelComm's own documents that RelComm clearly had access to and, in fact, refused to give to other bidders. RelComm clearly cannot claim a bidding irregularity regarding "documents not given to other bidders" when RelComm itself had access to these documents because it generated them in the course of its earlier E-rate work at the District.

In addition to this glaring omission by RelComm is the additional fact that nowhere does RelComm explain the significance of these documents, or how it gave MTG an unfair advantage over it or other bidders. RelComm does not make this claim because it cannot.

RelComm itself had the distinct advantage of being the most familiar with the network infrastructure (having been the provider for the past four years sans a competitive bidding process.) MTG, on the other hand, had no knowledge of the kind of network in place, or types of network servers, or even the manner of interconnections on the network. When MTG questioned the district tech employee who was at the first walk-through about network infrastructure, the district technician produced two documents but clearly advised the vendors that she did not know if the information was accurate, when it was developed or even if it was up to date. The Network Diagram merely showed the number of servers and the wiring diagram merely showed the manner of interconnections on the network. Neither provided any unfair advantage, nor can RelComm prove any.

Moreover, the documents regarding the PVBX system were not provided by the School District. Rather, MTG obtained these documents from the Internet. MTG was never given different specifications or modified specifications that were not given to RelComm or other bidders. In fact, although thousands of pages of documents have been produced in the aforementioned litigation, RelComm can point to no such different or modified specifications.

**VI. MTG'S BID WAS PROPERLY DETERMINED TO BE THE BEST SOLUTION**

RelComm contends that because MTG's bid was the highest at \$3.6 million and allegedly contained non-E-ratable items, it should be disqualified. *See Request for Review at 9.* However, the \$3.6 million "best solution" bid included "per drop" pricing for cabling, which allows the School Board to scale up or down the amount of wiring they wished to submit.

Additionally, MTG provided the School Board with pricing on non-E-rate eligible items which were separate and intended to let the School Board know what it would encounter financially to fully implement the technology. All was properly in accordance with the “best solution” approach specifically asked for, and stressed to the vendors, by the School District.

In addition, RelComm contends that the unlawful nature of MTG’s bid is demonstrated by its “wastefulness.” *See RelComm Request for Review at 10.* RelComm contends that MTG’s bid, calling for the complete rewiring of the entire district network despite the fact that the existing wiring was under warranty, is wasteful. The fact that the existing wiring may be under warranty is not the issue and RelComm, again, misses the mark.

First, MTG’s contract award does not call for rewiring of the entire ACBOE network. The cover letter that was submitted with the bid states only that “many schools” should have their wiring replaced. See Exhibit “B” attached hereto. Furthermore, as the letter indicates, the way that many of the schools were wired provided an inefficient network infrastructure and, in some cases, failed to meet industry standards. For example, there were instances whereby the location of the existing wiring did not allow for any electrical components, such as network switches and UPS equipment, to be powered via AC power. Moreover, having network wiring in that fashion was inefficient in trying to diagnose network problems in cases where technicians would need to enter and disrupt classes to try and diagnose problems.

Further, MTG did not intend to replace all of the wiring but only those that suffered from the above problems. (There were a few areas where the wiring was properly installed and those areas would not be replaced.) Therefore, MTG recommended the wiring be replaced in

certain areas and, in some cases, certain buildings. Again, this recommendation was consistent with the ACBOE's desire for a "best possible solution."

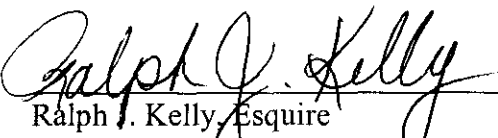
Conversely, as far as "wastefulness" goes, it was RelComm that excessively billed the District for servers and other hardware for many times the going rate in RelComm's earlier E-rate projects. *See Atlantic City Board of Education Response, Appendix 1, Answer and Counterclaim to Plaintiff's Complaint, at 9 - 12, Paragraphs 8 - 17.*

**VII. CONCLUSION**

MTG properly and competitively bid for the ACBOE contract and RelComm's bid protest is meritless. For the foregoing reasons, MTG requests that RelComm's Request for Review be denied, that all relief requested by RelComm be denied, and that the Commission award such other and further relief as is just and necessary.

**ABRAHAMS, LOEWENSTEIN & BUSHMAN, P.C.**

BY:

  
\_\_\_\_\_  
Ralph J. Kelly, Esquire  
Donna M. Brennan-Scott, Esquire  
Attorneys for Micro Technology Groupe, Inc.

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*Attorneys for Defendant, Micro Tech*

**BEFORE THE FEDERAL COMMUNICATIONS COMMISSION**

Schools and Libraries Universal Service	:	CC Docket No. 02-6
Mechanism	:	
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In the Matter of Request for Review by	:	
RelComm, Inc. of the Decision of the Universal	:	Billed Entry No. 123420
Administrator	:	Atlantic City Board of Education

**PROOF OF SERVICE**

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I further certify that on November 5, 2004, I, the undersigned, personally served one copy of the within Petition of Micro Technology Groupe, Inc. for Waiver of 47 C.F.R. § 54.721(d) and Response to Request for Review by RelComm, Inc. of Decision of Universal Administrator upon the following individuals via First Class Mail:

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Flaster Greenberg, P.C.  
1810 Chapel Road  
West Cherry Hill, NJ 08002

Gino F. Santori, Esquire  
Jacobs & Barbone  
1125 Pacific Avenue  
Atlantic City, NJ 08240

Michael Blee, Esquire  
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8025 Black Horse Pike  
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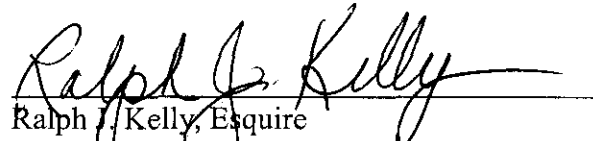
Deborah Weinstein, Esquire  
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Joseph Lang, Esquire  
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Schools and Library Division  
Box 125  
Correspondence Unit  
80 South Jefferson Road  
Whippany, NJ 07981

I hereby certify that the foregoing statements made by me are true. I am aware that if any  
of the foregoing statements made by me are willfully false, I am subject to punishment.

BY:

  
Ralph J. Kelly, Esquire  
Donna M. Brennan-Scott, Esquire

Dated: November 5, 2004





**FILED**

SEP - 7 2004

WILLIAM E. NUGENT, J.S.C.

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**RELCOMM, INC.,****Plaintiff****v.**

**ATLANTIC CITY BOARD OF  
EDUCATION, MARTIN FRIEDMAN AND  
ALEMAR CONSULTING, MICRO  
TECHNOLOGY GROUP, INC., FREDRICK  
P. NICKELS and DONNA HAYE**

**Defendant(s)**

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
ATLANTIC COUNTY**

**Docket No. ATL-L-477-04****Civil Action****Management Order****( ) Initial****(X) Supplemental**

**THIS MATTER** coming before the Court on July 16, 2004 for a Management Conference, J. Philip Kirchner, Esquire appearing on behalf of Plaintiff RelComm, Inc; Michael J. Blee, Esquire, appearing on behalf of the Atlantic City Board of Education [ACBOE]; Donna Brennan Scott, Esquire appearing on behalf of Micro Technology Group, Inc; Joseph Lang, Esquire appearing via telephone on behalf of the Atlantic City Board of Education [ACBOE] for the Seventh Count of Plaintiff's Complaint only; Deborah Weinstein, Esquire, appearing via telephone on behalf of Martin Friedman and Alemar Consulting; and the Court having determined to enter this Order dealing with the management of these proceedings as noted during the conference;

**THIS MATTER** also coming before the Court on August 2, 2004 for a Management Conference conducted via telephone, J. Philip Kirchner, Esquire appearing on behalf of Plaintiff RelComm, Inc; Michael J. Blee, Esquire, appearing on behalf of the Atlantic City Board of

Education [ACBOE]; Gino Santori, Esquire, appearing on behalf of Defendant's Nickels and Hays; Deborah Weinstein, Esquire, appearing via telephone on behalf of Martin Friedman and Alernar Consulting; Laura Tillman, Esquire, appearing via telephone on behalf of the Atlantic City Board of Education [ACBOE] for the Seventh Count of Plaintiff's Complaint only;

**IT IS ON THIS 7th DAY OF September, 2004 ORDERED:**

1. By consent of Plaintiff, RelComm, Inc., through its attorneys, Flaster/ Greenberg, PC, Plaintiff will voluntarily dismiss Count One of the Complaint alleging a violation of the New Jersey Anti-Trust Act, N.J.S.A. 56:9-1 et seq. and Count Three, alleging a violation of the New Jersey Public School Contract Law, N.J.S.A. 18A-1 et seq. without prejudice as to all defendants and any and all remaining claims against Micro Technology Group, Inc. shall be dismissed without prejudice and a Stipulation of Dismissal prepared by Plaintiff and its attorneys will be circulated among Counsel and filed with the Court;

2. Any and all outstanding document requests served by Plaintiff upon Defendant ACBOE and Defendants Nickels and Hays shall be supplied and/or made available for additional inspection on or before September 15, 2004;

3. The Court did not order specific dates upon which depositions shall be conducted. All depositions should be completed within the time frame established within this Order and convened on a date, time and location, which is mutually agreeable between the parties. However, in the absence of such an agreement between the parties, the Court will establish deposition "default dates" which are set forth below. With respect to those depositions that are conducted on "default dates", Counsel is precluded from canceling "default date" depositions in the event that designated trial counsel is unavailable. Counsel should select another member of their firm to attend the deposition or the deposition shall proceed in the absence of their representation.

4. Plaintiff's counsel intends to depose the following employees of Defendant ACBOE: Lisa Mooney, Marilyn Cohen and Elijah Thompkins. The Court has established the following default dates for the depositions of those three individuals: August 20, 2004 and September 17, 2004;

5. Plaintiff intends to depose Martin Friedman of Alemar Consulting. The default date for Mr. Friedman is October 1, 2004;

6. Plaintiff intends to conduct the deposition of two employees of Micro Technology Group, Inc. The default date for those depositions is October 29, 2004;

7. Plaintiff intends to depose Fredrick P. Nickles and Donna Haye. The default dates for those depositions are November 12, 2004 and/or November 15, 2004;

8. Plaintiff shall conclude all depositions on or before November 30, 2004;

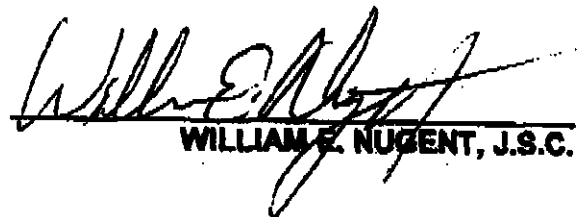
9. Defendant ACBOE has identified the following individuals to be deposed: Michael Shea, President of RelComm; Suzanne Zammit, Relcomm Director of Marketing; Konstantine Raznitsky, RelComm, Director of Technology; Joseph Coccovias, an employee of RelComm, Inc.; Jack Wingard, an employee of RelComm, Inc.; Jon Jones, a former ACBOE employee and Frank Delonzo, Technology Coordinator of the Toms River School District. The default dates for those depositions are as follows: December 1, 2004, December 2, 2004, December 3, 2004, December 10, 2004, December 13, 2004, December 14, 2004 and December 15, 2004;

10. Defendants Nickles and Haye intend to depose the following individuals: Bo Christian, ACBOE Vice Principal of Ohio Avenue School; Bo Christian, ACBOE Vice Principal of Ohio Avenue School; Carol Cox, ACBOE Administrative Secretary; Rebecca Barrett, ACBOE Administrative Secretary; Wilma Rodriguez, Purchasing Secretary; Kathy Silvern, Purchasing Secretary; Roy Wesley, ACBOE Tech Teacher/Webmaster; Donald Harris, ACBOE Tech Teacher; Marty Small, former ACBOE Board member and Judy Brown, ACBOE Tech Teacher.

The default dates for those depositions are as follows: January 7, 2005, January 14, 2005, January 21, 2005, and January 28, 2005.

11. All other depositions to be conducted by the parties shall be completed on or before February 28, 2005.

12. A Management Conference will be scheduled by the Court on December 22 2004 at 8:45 AM PM. All parties may appear via telephone. The conference call shall be initiated by Counsel for RelComm, Inc.

  
WILLIAM E. NUGENT, J.S.C.



January 30, 2003

Mr. Martin Friedman  
442 Lyndhurst Drive  
Broomall, PA 19008

Dear Mr. Friedman,

MICRO Technology Groupe, Inc. (MTG) is pleased to submit this comprehensive proposal for the Atlantic City Board of Education Year 6 E-rate application.

We have proposed a solution for internal connections. This includes: cabling, network electronics, servers, and video. It also includes installation costs, maintenance agreements, and engineering costs.

We have used hardware from Cisco Systems and Compaq (HP) for the servers and network electronics. As you are aware, Cisco and Compaq are widely recognized as leaders in the technology industry.

We have configured the servers as per the bid specifications.

We feel the wiring in many of the schools should be replaced. We are not willing to provide any LAN enhancements using the existing wiring in those schools. We have provided prices to rewire (or add wiring) to the buildings. There is a per drop price for a cable run which will allow you to make any add/deletes to the number of runs that we propose.

We understand the district has two-pair fiber optic cable from each school building to the Dr. Martin Luther King School Complex. We propose to use this fiber as the districts' Wide Area Network links. We propose two Cisco Catalyst 6509 switches to provide redundant WAN connection.

Further, we propose Cisco Catalyst 6506 switches in each school building with Cisco Catalyst 2950 stackable switches in the various network closets.

Please be aware there are a few issues the district must address. They include providing adequate environmental conditions in the wiring closets and providing proper electrical power in the buildings. We do not believe these services are eligible under Year 6 of the E-rate program. MTG can provide the names of companies who offer such services.

MTG has been providing technology solutions to schools and businesses since 1989. We offer the highest quality of support on both the Windows and Macintosh platforms. We understand the district uses a mix of Windows and Mac OS computers. We believe we can partner with the district to become a reliable and valued Systems Integrator.

We would appreciate to speak with you and the district regarding our complete proposal. I can be reached at (877) 366-3684 ext. 385. Please be aware, we recently moved our company headquarters to 311A Old Rodgers Road, Bristol, PA 19007. We can be reached on the web at [www.mtgroupe.com](http://www.mtgroupe.com).

Thank you for your time and courtesy.

Regards,

Richard D. Linkhorst  
Account Executive